

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Chapter 13

MAURICE GINDRAW and
GENEVA GINDRAW
Debtors

Case No.: 18-14344-elf

DEBTOR'S RESPONSE TO CERTIFICATION OF DEFAULT OF SN SERVICING

Debtor-Respondents, Maurice Gindraw and Geneva Gindraw (hereafter :Debtors") responds to the Certification of Default of SN Servicing.

1. On June 23, 2022, attorney for Debtors received Notice of Default from counsel for SN Servicing, claiming that Debtors owed \$12,060.77 in post-petition payments.
2. Attorney for Debtors provided proof of payments for the period in question in the amount of \$10,960.00.
3. Attorneys for SN Servicing credited Debtors with said payments, and also advised that there could be additional credit due to Debtors if they can show proof of payments from April-September, 2020, when the servicing of the loan was transferred to SN Servicing.
4. Debtors have proof of payments during this period in the amount of \$2,986.00.
5. On July 21, 2022, attorneys for SN Servicing filed a Certification of Default, requesting \$12,224.06., despite Debtors providing evidence that payments had been made.

6. Debtors deny the alleged delinquency as stated in the Creditors Certification regarding the Post-Petition payment history and have sufficient funds to cure any amounts that may be currently due.

WHEREFORE, Debtor respectfully requests an Order denying SN Servicing's Certification of Default.

Date:

BY: _____
ASHLEY M. SULLIVAN, EQUIRE
SPEAR WILDERMAN, P.C.
230 S. Broad Street, 14th Floor
Philadelphia, PA 19102
(215) 732-0101
(215) 7342-7790 (fax)
asullivan@spearwilderman.com
Attorney for Debtor